

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

KARINA TELLO,

Plaintiff,

v.

**LEA COUNTY BOARD OF COUNTY
COMMISSIONERS, COREY HELTON,
MICHAEL WALKER, FERNANDO JIMENEZ,
SEAN ROACH, SONIA ESTRADA,
DIANE JURADO-GARCIA,
AILEEN VIZCARRA, ALYSSA PORRAS,
DOE DEFENDANTS 1-50,**

Defendants.

NOTICE OF REMOVAL

Defendants Lea County Board of County Commissioners, Corey Helton, Michael Walker, Fernando Jimenez, and Sean Roach (“County Defendants”), by and through counsel, MYNATT SPRINGER P.C. (Benjamin J. Young and Sara E. Woods), hereby remove this action to the United States District Court for the District of New Mexico. In support of removal, County Defendants state as follows:

1. County Defendants are a county government and political subdivision of the State of New Mexico, Lea County officials, and Lea County employees.
2. Upon information and belief, Plaintiff is a resident of the State of New Mexico.
3. This Court has jurisdiction under 28 U.S.C. § 1441, in that Plaintiff alleges that this cause of action arises under the United States Constitution, particularly under Title VII of the Civil Rights Act of 1964 under 42 U.S.C. §§ 2000, et seq., the Fourteenth Amendment’s Equal

Protection Clause and Due Process Clause under 42 U.S.C. § 1983, and 42 U.S.C. § 1985 Conspiracy to Interfere with Civil Rights and involves federal questions.

4. The United States District Court for the District of New Mexico is the proper Court to remove actions from the Fifth Judicial District Court for the State of New Mexico.

6. Pursuant to 28 U.S.C. § 1446, Defendant is attaching a copy of all process, pleadings, and orders that have been filed in this matter as Exhibit A, the Fifth Judicial District Court Docket as Exhibit B, the *Notice to State District Court of Removal to Federal District Court* as Exhibit C, and the Civil Cover Sheet as Exhibit D.

7. Pursuant to 28 U.S.C. § 1446(b), this Notice of Removal is timely, because it is filed within thirty (30) days after service of a copy of an initial pleading setting forth the claim for relief.

WHEREFORE, County Defendants hereby give notice that this action is removed to the United States District Court for the District of New Mexico.

Respectfully submitted,

MYNATT SPRINGER P.C.


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CERTIFICATE OF SERVICE

I certify that, on April 25, 2024, a copy of the foregoing pleading was served on the below counsel of record via electronic mail:

Benjamin Gubernick
ben@wglawllp.com
Attorney for Plaintiff



BENJAMIN J. YOUNG
SARA E. WOODS